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Attorneys for Defendants,
CITY OF SAN JOSE and ROBERT DAVIS

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

NOREEN SALINAS,

Plaintiff,

v.

CITY OF SAN JOSE, CHIEF ROBERT
DAVIS, TASER INTERNATIONAL, INC.,
and DOES 1 TO 10, inclusive,

Defendants.

Case Number: C08-02625 RS

**STIPULATION AND [PROPOSED]
ORDER MODIFYING INITIAL CASE
MANAGEMENT SCHEDULE**

Plaintiff in the above-entitled action, Noreen Salinas, and Defendants City of San Jose and Chief Robert Davis hereby stipulate to a partial modification of the Court's Order setting Initial Case Management Conference and ADR deadlines in this matter, filed on May 23, 2008. These parties request that the Court adopt this Stipulation and enter an Order thereon.

These parties stipulate that the deadline to meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan as well as the deadline to file a Joint ADR Certification with Stipulation to ADR Process or Notice of Need for ADR Phone Conference be extended by one (1) week from the date set forth in the Court's Order, to August 27, 2008.

In support of this Stipulation, the parties submit that the San Jose City Attorney's Office has recently been assigned the defense of Defendants City of San Jose and Chief Robert Davis and is still in the process of reviewing and evaluating the Complaint in this matter, and compiling documents and other related materials. In addition, the parties have stipulated that these Defendants shall file a responsive pleading to the Plaintiff's Complaint no later than August 29, 2008.

Respectfully submitted,

Dated: August 19, 2008

By: /S/
DALE K. GALIPO
Attorney at Law

Attorney for Plaintiff,
NOREEN SALINAS

Dated: August 20, 2008

RICHARD DOYLE, City Attorney

By: /S/
MICHAEL J. DODSON
Sr. Deputy City Attorney

Attorneys for Defendants,
CITY OF SAN JOSE and ROBERT DAVIS

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5 August 27, 2008.

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8 Davis and is still in the process of reviewing and evaluating the Complaint in this matter, and
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10 these Defendants shall file a responsive pleading to the Plaintiff's Complaint no later than
11 August 29, 2008.

12 Respectfully submitted,

13
14 Dated: August 19, 2008

15 By: 

DALE K. GALIPO
Attorney at Law

16 Attorney for Plaintiff,
17 NOREEN SALINAS

18
19 Dated: August _____, 2008

RICHARD DOYLE, City Attorney

20
21 By: _____

MICHAEL J. DODSON
Sr. Deputy City Attorney

22 Attorneys for Defendants,
23 CITY OF SAN JOSE and ROBERT DAVIS

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STIPULATION AND (PROPOSED) ORDER MODIFYING
INITIAL CASE MANAGEMENT SCHEDULE

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ORDER

Pursuant to the Stipulation of Plaintiff Noreen Salinas and Defendants City of San Jose and Chief Robert Davis,

IT IS HEREBY ORDERED that the deadline for these parties to meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan as well as the deadline to file a Joint ADR Certification with Stipulation to ADR Process or Notice of Need for ADR Phone Conference be extended by one (1) week from the date set forth in the Court's Order, to August 27, 2008.

Dated: _____

RICHARD SEEBORG
United States Magistrate Judge